

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

|                            |   |                       |
|----------------------------|---|-----------------------|
| S.T.,                      | ) |                       |
|                            | ) |                       |
| Plaintiff,                 | ) |                       |
|                            | ) |                       |
| v.                         | ) | CIVIL ACTION FILE     |
|                            | ) | NO. 4:24-CV-00225-WMR |
| CARSON LOOP ESM, LLC d/b/a | ) |                       |
| BUDGETEL, and SRINIVAS     | ) |                       |
| BOLLEPALLI,                | ) |                       |
|                            | ) |                       |
| Defendants.                | ) |                       |

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IN THE UNITED STATES DISTRICT COURT  
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| A.H.,                      | ) |                       |
|                            | ) |                       |
| Plaintiff,                 | ) |                       |
|                            | ) |                       |
| v.                         | ) | CIVIL ACTION FILE     |
|                            | ) | NO. 4:24-CV-00224-WMR |
| CARSON LOOP ESM, LLC d/b/a | ) |                       |
| BUDGETEL, and SRINIVAS     | ) |                       |
| BOLLEPALLI,                | ) |                       |
|                            | ) |                       |
| Defendants.                | ) |                       |

**NOTICE TO TAKE VIDEOTAPED DEPOSITION**

PLEASE TAKE NOTICE, pursuant to Federal Rules of Civil Procedure 26  
and 30, that beginning at 10:00 a.m. on Tuesday, December 16, 2025, at the

Bartow County Sheriff's Office, 104 Zena Drive, Cartersville, Georgia, and continuing from hour to hour and day to day until adjourned, counsel for Plaintiffs shall proceed to take the deposition of **Special Agent James Rives**. The deposition will be upon oral examination before an officer authorized by law to administer oaths and to take depositions and will be videotaped. The deposition will be taken for all purposes allowed by law.

This 9th day of December, 2025.

Respectfully submitted,

**LAW & MORAN**

/s/ Denise D. Hoying

Peter A. Law

Georgia Bar No. 439655

E. Michael Moran

Georgia Bar No. 521602

Denise D. Hoying

Georgia Bar No. 236494

*Attorneys for Plaintiffs*

563 Spring Street, NW  
Atlanta, Georgia 30308  
Phone: (404) 814-3700  
Facsimile: (404) 842-7710  
[Pete@lawmoran.com](mailto:Pete@lawmoran.com)  
[Mike@lawmoran.com](mailto:Mike@lawmoran.com)  
[Denise@lawmoran.com](mailto:Denise@lawmoran.com)

**ANDERSEN, TATE & CARR, P.C.**

*/s/ Patrick J. McDonough*

Patrick J. McDonough

Georgia Bar No. 489855

Jonathan S. Tonge

Georgia Bar No. 303999

*Attorneys for Plaintiffs*

One Sugarloaf Centre  
1960 Satellite Boulevard, Suite 4000  
Duluth, Georgia 30097  
Phone: (770) 822-0900  
Facsimile: (770) 822-9680  
[pmcdonough@atclawfirm.com](mailto:pmcdonough@atclawfirm.com)  
[jtonge@atclawfirm.com](mailto:jtonge@atclawfirm.com)

**CERTIFICATE OF COMPLIANCE**

This is to certify that the foregoing *Notice to Take Videotaped Deposition* has been prepared with one of the font and point selections approved by the Court in L.R. 5.1. Specifically, the above-mentioned pleading was prepared using Times New Roman font of 14 point size.

Respectfully submitted,  
**LAW & MORAN**

/s/ Denise D. Hoying  
Denise D. Hoying  
Georgia Bar No.236494  
*Attorney for Plaintiffs*

**LAW & MORAN**  
563 Spring Street, NW  
Atlanta, Georgia 30308  
Phone: (404) 814-3700  
Facsimile: (404) 842-7710  
[Denise@lawmoran.com](mailto:Denise@lawmoran.com)

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| BUDGETEL, and SRINIVAS     | ) |                       |
| BOLLEPALLI,                | ) |                       |
|                            | ) |                       |
| Defendants.                | ) |                       |

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a true and correct copy of the foregoing *Notice to Take Videotaped Deposition* with the Clerk of Court using the

CM/ECF system which will automatically send email notification of such filing to:

Phillip Friduss  
Jacob O'Neal  
Hall Booth Smith, P.C.  
191 Peachtree Street, N.E.  
Suite 2900  
Atlanta, GA 30303

Sean W. Martin  
Stephen A. Swanson  
Carr Allison  
633 Chestnut St.  
Suite 2000  
Chattanooga, TN 36450

This 9th day of December, 2025.

**LAW & MORAN**

/s/ Denise D. Hoying  
Denise D. Hoying  
Georgia Bar No. 236494  
*Attorney for Plaintiffs*

**LAW & MORAN**  
563 Spring Street, NW  
Atlanta, Georgia 30308  
Phone: (404) 814-3700  
Facsimile: (404) 842-7710  
[Pete@lawmoran.com](mailto:Pete@lawmoran.com)  
[Mike@lawmoran.com](mailto:Mike@lawmoran.com)  
[Denise@lawmoran.com](mailto:Denise@lawmoran.com)